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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

AT GREENBELT  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
DEPUTY

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

SAUNDRA LUCILE WHITE,

Defendant

(Wire Fraud, 18 U.S.C. § 1343;  
Aggravated Identity Theft, 18 U.S.C.  
§ 1028A; Forfeiture, 18 U.S.C.  
§ 981(a)(1)(C), 28 U.S.C. § 2461(c))

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INDICTMENTCOUNT ONE

The Grand Jury for the District of Maryland charges that:

Introduction

1. Between in or about March 2010 and in or about May 2013, defendant **SAUNDRA LUCILE WHITE** purported to serve as the attorney for P.H.
2. **WHITE** was ordered disbarred from the practice of law in the District of Columbia on January 20, 2011 and in Maryland on September 9, 2011. **WHITE** never informed P.H. that she was pending disbarment or that she was no longer a licensed attorney.
3. P.H. received temporary guardianship of her relative, C.M., who had been incapacitated by a stroke on December 26, 2009, in April of 2010 and permanent guardianship on October 13, 2010.
4. In or about March or April 2010, **WHITE** requested that P.H. provide **WHITE** with an accounting of C.M.'s assets, which P.H. provided.

P

CAS: USAO 2013R00184

AW 13 CR 0436

**The Scheme to Defraud**

5. Between in or about March 2010 and in or about May 2013, defendant **WHITE** knowingly and willfully devised and intended to devise a scheme and artifice to defraud C.M. and P.H. by means of false and fraudulent pretenses, representations, and promises ("the scheme to defraud").

**Means and Methods of the Scheme to Defraud**

6. It was a part of the scheme to defraud that defendant **WHITE** fraudulently created numerous fraudulent notices that purported to be from the Internal Revenue Service ("IRS") that demanded payment of back taxes purportedly owed by C.M. and E.M., C.M.'s deceased relative.

7. It was further a part of the scheme to defraud that defendant **WHITE** mailed and faxed these fraudulent IRS notices to P.H.

8. It was further a part of the scheme to defraud that defendant **WHITE** continually advised P.H. that P.H., in her role a legal guardian of C.M., was required to remit payment for these taxes as stated by the fraudulent notices and to send the payments to a Post Office Box in Annapolis, Maryland that was controlled by **WHITE**.

9. It was further a part of the scheme to defraud that defendant **WHITE** obtained a driver's license from the Maryland Motor Vehicles Administration in C.M.'s name but bearing **WHITE**'s photograph.

10. It was further a part of the scheme to defraud that defendant **WHITE** opened a bank account at Wells Fargo Bank ending in the digits 9549 in the name of C.M. and obtained debit cards in C.M.'s name.



11. It was further a part of the scheme to defraud that defendant **WHITE** deposited the approximately 39 checks P.H. sent in response to the fraudulent IRS notices into this Wells Fargo account, totaling at least \$782,223.05, and then withdrew the funds and used them for her own personal benefit.

**The Charge**

12. On or about June 17, 2010, in the District of Maryland and elsewhere, the defendant, **SAUNDRA LUCILE WHITE**, for the purpose of executing and attempting to execute a scheme to defraud, did knowingly cause to be transmitted in interstate commerce by means of wire communications, certain signals, signs, and sounds, in that **WHITE** caused a wire transmission – in the form of a fax transmission of a fraudulent IRS notice for taxes allegedly owed by C.M. – to be made from **WHITE**'s office at 1401 Mercantile Lane, Largo, Maryland to P.H. at a residence located in Washington, D.C.

18 U.S.C. § 1343

**COUNT TWO**

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 4 of Count One are incorporated here.
2. Between in or about March 2012 and in or about February 2013, in the District of Maryland and elsewhere, the defendant,

**SAUNDRA LUCILE WHITE,**

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, the name of C.M., during and in relation to a felony violation, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, as charged in Count One of this Information and incorporated here, in that **WHITE** obtained a driver's license from the Maryland Motor Vehicles Administration in C.M.'s name but bearing **WHITE**'s photograph.

18 U.S.C. § 1028A

**FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

1. Upon conviction of the offense set forth in Count One of this Indictment, the defendant,

**SAUNDRA LUCILE WHITE,**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense or any property traceable to such property. The property to be forfeited includes, but is not limited to:

- a. \$782,223 in United States currency;
- b. a 2008 Silver Ford Escape bearing VIN: 1FMCU59H38KB24668;
- c. a 2010 Silver Lexus RX450H bearing VIN: JTJBC1BA9A2413162;
- d. a 2001 Silver Volvo C70 bearing VIN: YV1672MC2BJ112151; and
- e. a brown Michael Kors watch.

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,



the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

18 U.S.C. § 981(a)(1)(C)  
28 U.S.C. § 2461(c)

Rod J. Rosenstein / (15)  
Rod J. Rosenstein  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

Foreperson

Date 8-19-13